

Jonathan Arthur

From: Jonathan Arthur <j.arthur@robertslaw.org>
Sent: Wednesday, January 5, 2022 10:19 AM
To: 'Dustin Plumadore'
Cc: 'Coreen Silverman'; 'Pam Khoury'; 'John Mumford'
Subject: RE: Subpoenas

I will be in the office all day today and tomorrow. Friday, I will be out until noon. I will file the motions to quash on Friday if I do not hear something from Correen by then.

-Jonathan

From: Dustin Plumadore <dplumadore@hancockdaniel.com>
Sent: Wednesday, January 5, 2022 10:11 AM
To: Jonathan Arthur <j.arthur@robertslaw.org>
Cc: Coreen Silverman <csilverman@hancockdaniel.com>; Pam Khoury <pkhoury@hancockdaniel.com>; John Mumford <jmumford@hancockdaniel.com>
Subject: RE: Subpoenas

Hi Jonathan,

Coreen is back in the country now, but is out of the office today. If you provide your availability I'm sure she can coordinate a call with you this week to discuss the subpoenas.

DUSTIN J. H. PLUMADORE

HANCOCK, DANIEL & JOHNSON, P.C.
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dplumadore@hancockdaniel.com | [vCard](#)



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From: Jonathan Arthur <j.arthur@robertslaw.org>
Sent: Tuesday, January 4, 2022 4:38 PM
To: Dustin Plumadore <dplumadore@hancockdaniel.com>
Subject: RE: Subpoenas

When does she get back?

From: Dustin Plumadore <dplumadore@hancockdaniel.com>
Sent: Thursday, December 30, 2021 10:58 AM
To: Jonathan Arthur <j.arthur@robertslaw.org>
Subject: RE: Subpoenas

Thank you, Jonathan. Coreen issued these subpoenas, so I will speak with her when she returns to the U.S. next week and we will get back to you then.

DUSTIN J. H. PLUMADORE

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From: Jonathan Arthur <j.arthur@robertslaw.org>
Sent: Tuesday, December 28, 2021 5:37 PM
To: Dustin Plumadore <dplumadore@hancockdaniel.com>; 'Anne Lahren' <alahren@PenderCoward.com>; 'RICHARD H. MATTHEWS' <RMATTHEW@PenderCoward.com>; 'Robert Samuel' <rsamuel@PenderCoward.com>; 'Bryan S. Peeples' <bpeeples@PenderCoward.com>
Cc: Coreen Silverman <csilverman@hancockdaniel.com>; John Mumford <jmumford@hancockdaniel.com>; Pam Khoury <pkhoury@hancockdaniel.com>; Tracy Brumfield <tbrumfield@hancockdaniel.com>
Subject: RE: Subpoenas

Dustin:

I think these subpoenae are untimely under the contours of the pretrial scheduling order which states that all discovery, including the time period for response to any discovery demand(s) must be completed by not later than December 28, 2021.

These entities, and their relationship with Mr. Nazario was disclosed at the beginning of discovery, and the SDT's Defendant Gutierrez has issued are to be responded outside the close of discovery. Thus, they are not permitted.

Kindly verify that you are going to withdraw the same so we can avoid further discovery briefing.

Thanks,

Jonathan

From: Dustin Plumadore <dplumadore@hancockdaniel.com>
Sent: Monday, December 27, 2021 4:08 PM
To: Jonathan Arthur <j.arthur@robertslaw.org>; 'Anne Lahren' <alahren@PenderCoward.com>; 'RICHARD H. MATTHEWS' <RMATTHEW@PenderCoward.com>; 'Robert Samuel' <rsamuel@PenderCoward.com>; 'Bryan S. Peeples' <bpeeples@PenderCoward.com>
Cc: Coreen Silverman <csilverman@hancockdaniel.com>; John Mumford <jmumford@hancockdaniel.com>; Pam Khoury <pkhoury@hancockdaniel.com>; Tracy Brumfield <tbrumfield@hancockdaniel.com>
Subject: Subpoenas

All,

On behalf of Coreen Silverman, please see the attached three (3) subpoenas to be served on the following:

- Virginia Department of Health
- Properties Remembered, LLC
- Richard Bland College Foundation

Thank you,

DUSTIN J. H. PLUMADORE
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From: Jonathan Arthur <j.arthur@robertslaw.org>
Sent: Tuesday, December 21, 2021 6:02 PM
To: 'Anne Lahren' <alahren@PenderCoward.com>; Coreen Silverman <csilverman@hancockdaniel.com>; Dustin Plumadore <dplumadore@hancockdaniel.com>; 'RICHARD H. MATTHEWS' <RMATTHEW@PenderCoward.com>; 'Robert Samuel' <rsamuel@PenderCoward.com>; 'Bryan S. Peeples' <bpeeples@PenderCoward.com>; John Mumford <jmumford@hancockdaniel.com>; Pam Khoury <pkhoury@hancockdaniel.com>
Subject: Plaintiff's deposition exhibits.

Counselors:

I have uploaded to dropbox the marked exhibits from the Plaintiff's depositions and sent you all a link. I will see you all on Thursday.

Cordially,

Jonathan M. Arthur, Esq.
Thomas H. Roberts & Associates, P.C.
105 South 1st St.
Richmond, VA 23219
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(804)-783-2000 – Firm
(804)-783-2105 - Fax

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